

CAUSE NO. 109720-CC**MICHAEL MCCLUNG AND
MINDY MCCLUNG,
Plaintiffs,**

v.

**WAL-MART STORES TEXAS, LLC D/B/A
WAL-MART SUPERCENTER #5191, AND
WAL-MART REAL ESTATE BUSINESS
TRUST,
Defendants.**§
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§**IN THE DISTRICT COURT OF****KAUFMAN COUNTY, TEXAS**

Kaufman County - County Court at Law

____ JUDICIAL DISTRICT

PLAINTIFFS' ORIGINAL PETITION AND JURY DEMAND

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES MICHAEL MCCLUNG, hereinafter "Plaintiff," complaining of and about WAL-MART STORES TEXAS, LLC D/B/A WAL-MART SUPERCENTER #5191 and WAL-MART REAL ESTATE BUSINESS TRUST, hereinafter collectively "Defendants," and files this Plaintiffs' Original Petition, Jury Demand, and First Set of Written Discovery Requests, and in support thereof, would respectfully show unto the Court as follows:

DISCOVERY CONTROL PLAN LEVEL

1. Plaintiff brings this action under Texas Rule of Civil Procedure 47(c)(4) and seeks monetary relief over \$1,000,000. Plaintiff intends that discovery be conducted under Discovery Level 3.

PARTIES AND SERVICE

2. Plaintiff, **MICHAEL MCCLUNG**, is an individual residing in Kaufman County, Texas. Pursuant to §30.014 of the Texas Civil Practice & Remedies Code, Plaintiff states that the last three numbers of Plaintiff's driver license are 768 and the last three digits of Plaintiff's social

security number are 793.

3. Plaintiff, **MINDY MCCLUNG**, is an individual residing in Kaufman County, Texas. Pursuant to §30.014 of the Texas Civil Practice & Remedies Code, Plaintiff states that the last three numbers of Plaintiff's driver license are 189 and the last three digits of Plaintiff's social security number are 124.

4. Defendant, **WAL-MART STORES TEXAS, LLC D/B/A WAL-MART SUPERCENTER #5191**, is a foreign limited liability company doing business in the State of Texas and may be served with process by serving its registered agent: **C T Corporation System at 1999 Bryan Street, Ste 900, Dallas, Texas 75201**, or wherever the agent may be found. **Issuance of a citation is requested at this time to include language that "Defendant may be required to make initial disclosures."**

5. Defendant, **WAL-MART REAL ESTATE BUSINESS TRUST**, is a foreign business trust doing business in the State of Texas and may be served with process by serving its registered agent: **C T Corporation System at 1999 Bryan Street, Ste 900, Dallas, Texas 75201**, or wherever the agent may be found. **Issuance of a citation is requested at this time to include language that "Defendant may be required to make initial disclosures."**

MISNOMER/ALTER EGO

6. In the event any parties are misnamed or are not included herein, it is Plaintiffs' contention that such was a "misidentification," "misnomer," and/or such parties are/were "alter egos" of parties named herein. Alternatively, Plaintiff contends that such "corporate veils" should be pierced to hold such parties properly included in the interest of justice.

JURISDICTION AND VENUE

7. The subject matter in controversy is within the jurisdictional limits of this Court.

8. This Court has jurisdiction over the parties, because said Defendants purposefully availed themselves of the privilege of conducting activities in the State of Texas and established minimum contacts sufficient to confer jurisdiction over said Defendants, and the assumption of jurisdiction over Defendants will not offend traditional notions of fair play and substantial justice and is consistent with the constitutional requirements of due process.

9. Further, as required by Rule 47(b), Texas Rules of Civil Procedure, Plaintiffs' counsel states that the damages, harms and losses sought are in an amount within the jurisdictional limits of this Court. Plaintiff is required by Rule 47(c), Texas Rules of Civil Procedure to state the amount of damages, in dollar amount, that represent Plaintiffs' harms and losses due to the negligence of the Defendants. The legislative history of this requirement indicates that it is for record keeping and statistical purposes only for lawsuits filed in the State of Texas. Plaintiffs' counsel states that Plaintiff seeks monetary relief, the maximum of which harms, losses and damages to Plaintiffs is over \$1,000,000. The amount of monetary relief actually assessed by the jury or judge, however, will ultimately be determined by a jury or judge after hearing all of the evidence of harms, damages and losses. Plaintiff also seeks pre-judgment and post-judgment interest at the highest legal rate as well as exemplary damages.

10. Venue in Kaufman County is proper in this cause under Section 15.002(a)(1) of the Texas Civil Practice and Remedies Code because all or a substantial part of the events or omissions giving rise to this lawsuit occurred in this county.

FACTS

11. On or about December 6, 2019, Plaintiff MICHAEL MCCLUNG was an Invitee on property owned and/or controlled by the Defendants **WAL-MART STORES TEXAS, LLC D/B/A WAL-MART SUPERCENTER #5191 and WAL-MART REAL ESTATE BUSINESS**

TRUST, located at 802 E. U.S. Highway 80, Forney, Kaufman County, Texas 75126. On the date of the incident, which makes the basis of this lawsuit, Plaintiff **MICHAEL MCCLUNG** was walking into the Wal-Mart Supercenter #5191 when he slipped and fell hitting his head causing him to bleed out of his left ear and lose consciousness. Defendants' failure to warn and/or to timely remedy the hazardous condition at the entrance of the premises was the proximate cause of the Plaintiffs' injuries and damages.

CAUSES OF ACTION

12. Defendants, **WAL-MART STORES TEXAS, LLC D/B/A WAL-MART SUPERCENTER #5191 and/or WAL-MART REAL ESTATE BUSINESS TRUST**, as owners, operators and/or managers of the premises in question, and by and through their employees and/or actual, apparent, ostensible or estoppel agents and/or representatives, at all times material hereto, owed a duty to act as a reasonable and prudent property owner, operator and/or management company would have done under the same or similar circumstances. Defendants were negligent and such negligence is the proximate cause of Plaintiff Michael McClung's injuries and damages.

13. Defendants breached their duties by, among other acts and/or omissions, as follows:
- a. Creating a condition on the premises which posed an unreasonable risk of harm to individuals such as Plaintiff;
 - b. Permitting an unreasonably dangerous condition which Defendants knew, or in the exercise of ordinary care should have known about, to exist on the premises in areas which Defendants knew that persons such as Plaintiff are likely to suddenly and unexpectedly encounter without warning and that constitute a hazard and risk of personal injury;
 - c. In choosing not to conduct reasonable inspections of the Defendants' premises in order to discover the condition on the premises which posed an unreasonable risk of harm to individuals such as Plaintiff;

- d. In choosing not to warn Plaintiff of the condition on the premises which posed an unreasonable risk of harm to individuals such as Plaintiff;
- e. In choosing not to make safe a condition on the premises which Defendants knew, or in the exercise of ordinary care should have known, posed an unreasonable risk of harm to individuals such as Plaintiff; and,
- f. In choosing not to timely and properly remedy the condition so as to prevent harm or injury to others such as Plaintiff.

14. At the time of the occurrence which makes the basis of this lawsuit, Defendants were the owners, operators, and/or the managers of the premises located at 802 E. U.S. Highway 80, Forney, Kaufman County, Texas 75126.

15. Plaintiff was at and/or on Defendants' premises with Defendants' knowledge and for their mutual benefit.

16. A condition on Defendants' premises posed an unreasonable risk of harm. The floor or ground at the entrance of Defendants' premises created a dangerous and hazardous condition proximately causing the occurrence in question.

17. Defendants knew or reasonably should have known of the dangerous condition existing on the premises in question.

18. Defendants had a duty to use ordinary care to ensure that the premises did not present a danger to Plaintiff. This duty included the duty to inspect and the duty to warn or to cure. Defendants breached the duty of ordinary care by choosing not to remedy the unsafe condition of the floor or ground at the entrance of Defendants' premise.

19. Defendants were also negligent in the hiring, supervision, training, and retaining its employees who cause and/or fail to remedy the unreasonably dangerous condition.

20. Plaintiff will show that Defendants failed to exercise ordinary care in performing such duty. The acts and/or omissions of Defendants described above by which Defendants

breached such duties constitutes a proximate cause of Plaintiff's damages described more fully below, for which Defendants are liable to Plaintiff.

21. Each of such acts and/or omissions, singularly or in combination with others, are a proximate cause of the occurrence and damages sustained by Plaintiff, for which Plaintiff prays judgment of this Court in an amount within the jurisdictional limits of this Court.

RESPONDEAT SUPERIOR LIABILITY

22. The employees, and/or actual, apparent, ostensible or estoppel agents and/or representatives of Defendants **WAL-MART STORES TEXAS, LLC D/B/A WAL-MART SUPERCENTER #5191 and/or WAL-MART REAL ESTATE BUSINESS TRUST**, were acting as employees and were in the course and scope of their respective employment and were within Defendants' general authority, in furtherance of Defendants' business, and for the accomplishment of the object for which Defendants' employees were hired. Defendants are therefore liable under the theory of *Respondeat Superior*. Therefore, Defendants are liable to Plaintiffs for the damages proximately caused by the acts and omissions of its employees, and/or actual, apparent, ostensible or estoppel agents and/or representatives.

DAMAGES – MICHAEL MCCLUNG

23. As a direct and proximate result of the breach of duty, negligent acts and/or omissions of Defendants, set forth herein above, Plaintiff suffered bodily injury and damages, and to incur the following damages:

- A. Medical care expenses sustained in the past;
- B. Medical care expenses that, in reasonable probability, Plaintiff will sustain in the future;
- C. Physical pain and mental anguish sustained in the past;

- D. Physical pain and mental anguish which, in reasonable probability, will be suffered in the future;
- E. Physical impairment in the past;
- F. Physical impairment which, in reasonable probability, will be suffered in the future;
- G. Loss of earnings in the past;
- H. Loss of earnings that, in reasonable probability, Plaintiff will sustain in the future;
- I. Loss of earning capacity in the past; and
- J. Loss of earning capacity that, in reasonable probability, Plaintiff will sustain in the future.

24. For the above reasons, Plaintiff has suffered losses and damages in a sum within the jurisdictional limits of the Court and for which this lawsuit is brought.

DAMAGES – MINDY MCCLUNG

25. As a direct and proximate result of the Defendants' negligence, Plaintiff was caused to suffer damages, as follows:

- A. Loss of support suffered in the past;
- B. Loss of support which, in reasonable probability, will be suffered in the future;
- C. Loss of services suffered in the past;
- D. Loss of services which, in reasonable probability, will be suffered in the future;
- E. Loss of marital relationship, affection, emotional support, and companionship suffered in the past;
- F. Loss of marital relationship, affection, emotional support, and companionship which, in reasonable probability, will be suffered in the future.

26. For the above reasons, Plaintiff has suffered losses and damages in a sum within the jurisdictional limits of the Court and for which this lawsuit is brought.

REQUIRED DISCLOSURES

27. Pursuant to Texas Rules of Civil Procedure 190 and 194, Defendants may be required to make initial disclosures, due within 30 days after the first answer is filed, unless otherwise agreed or changed by court order.

INTENT TO USE DEFENDANTS' DOCUMENTS

28. In accordance with Texas Rules of Civil Procedure 193.7, any documents produced by Defendants in response to written discovery will be used by Plaintiff at any pre-trial proceeding or trial.

INTENT TO USE U.S. LIFE TABLES

29. Plaintiffs hereby notify the Defendants of their intent to use U.S. Life Tables as published by the U.S. Government in trial of this matter.

REQUEST FOR JURY

30. Plaintiffs request a trial by jury on all issues herein and tender the appropriate fee at the time of filing of this petition.

31. Plaintiffs have met all conditions present to the filing of this lawsuit.

DESIGNATED ESERVICE EMAIL ADDRESS

32. The following is the undersigned attorney's designation of electronic service email address for all electronically served documents and notices, filed and unfiled, pursuant to Tex.R.Civ.P. 21(f)(2) & 21(a): **eservice@kastllaw.com**. This is the undersigned's ONLY electronic service email address, and service through any other email address will be considered invalid.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully pray that the Defendants be cited to appear and answer herein, and that upon a final hearing and trial of this cause, Plaintiffs have judgment against Defendants, jointly and severally, for damages for monetary relief over \$1,000,000 which is within the jurisdictional limits of this Court; together with pre-judgment interest from the date of injury through the date of judgment at the maximum rate allowed by law; post-judgment interest at the highest legal rate until the time the judgment is paid; costs of court; and such other and further relief to which Plaintiffs may be justly entitled at law or in equity.

Respectfully submitted,

KASTL LAW, P.C.

/s/ Kristina N. Kastl

Kristina N. Kastl

State Bar No. 24025467

Email: eservice@kastllaw.com

Email: kkastl@kastllaw.com

Samantha C. Johnson

State Bar No. 24126019

Email: sjohnson@kastllaw.com

4144 North Central Expressway, Suite 1000

Dallas, Texas 75204

Phone: (214) 821-0230

Fax: (214) 821-0231

ATTORNEYS FOR PLAINTIFFS

***Please note and document Kastl Law, P.C.'s new eserve address. All future eserve notifications must be served at: eservice@kastllaw.com.**

Service is only effectuated if it is served through our eservice@kastllaw.com email. Any other Kastl Law, P.C. email is considered ineffective service.



CT Corporation

**Service of Process
Transmittal**

12/09/2021

CT Log Number 540715363

TO: Kim Lundy- Email
Walmart Inc.
702 SW 8TH ST
BENTONVILLE, AR 72716-6209

RE: Process Served in Texas

FOR: Wal-Mart Stores Texas, LLC (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Re: MCCLUNG MICHAEL AND MINDY MCCLUNG // To: Wal-Mart Stores Texas, LLC

DOCUMENT(S) SERVED: Citation, Petition and Demand

COURT/AGENCY: Kaufman County Court At Law, TX
Case # 109720CC

NATURE OF ACTION: Personal Injury - Slip/Trip and Fall - 12/06/2019, Wal-Mart Supercenter #5191
located at 802 E. U.S. Highway 80, Forney, TX, 75126

ON WHOM PROCESS WAS SERVED: C T Corporation System, Dallas, TX

DATE AND HOUR OF SERVICE: By Process Server on 12/09/2021 at 03:22

JURISDICTION SERVED : Texas

APPEARANCE OR ANSWER DUE: By 10:00 a.m. of the Monday next following the expiration of 20 days after service
(Document(s) may contain additional answer dates)

ATTORNEY(S) / SENDER(S): Kristina N. Kastl
Kastl Law, P.C.
4144 North Central Expressway, Suite 100
Dallas, TX 75204
214-821-0230

ACTION ITEMS: CT has retained the current log, Retain Date: 12/09/2021, Expected Purge Date:
12/14/2021

Image SOP

REGISTERED AGENT ADDRESS: C T Corporation System
1999 Bryan Street
Suite 900
Dallas, TX 75201
877-564-7529
MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.



PROCESS SERVER DELIVERY DETAILS

Date: Thu, Dec 9, 2021

Server Name: Troy Hernandez

Entity Served	WAL-MART STORES TEXAS, LLC
Case Number	109720CC
Jurisdiction	TX



PERSONAL CITATION
THE STATE OF TEXAS

CAUSE # 109720-CC

NOTICE TO THE RESPONDENT: "You have been sued. You may employ an attorney. If you or your attorney does not file a written answer with the clerk who issued this citation by 10:00 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org."

TO: **WAL-MART STORES TEXAS, LLC D/B/A WAL-MART SUPERCENTER #5191**
c/o C T Corporation System
1999 Bryan Street Ste 900
Dallas TX 75201

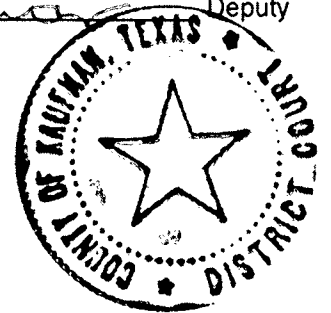
Respondent Greetings:

YOU ARE HEREBY COMMANDED to appear before the Honorable County Court at Law, Kaufman County, Texas, by filing a written answer to the **PLAINTIFF'S ORIGINAL PETITION AND JURY DEMAND** of the Plaintiff at or before 10:00 o'clock a.m. of the Monday next after the expiration of 20 days from the date of service hereof, a copy of which accompanies the Citation in Cause Number **109720-CC, styled MICHAEL MCCLUNG, MINDY MCCLUNG Vs. WAL-MART STORES TEXAS, LLC D/B/A WAL-MART SUPERCENTER #5191, WAL-MART REAL ESTATE BUSINESS TRUST**, filed in said court on December 06, 2021. WITNESS, RHONDA HUGHEY, District Clerk of Kaufman County, Texas.

Issued and given under my hand and seal of said Court at Kaufman, Texas, on this the 7th day of December, 2021.

RHONDA HUGHEY
DISTRICT CLERK
100 W Mulberry St
Kaufman, TX 75142

By Sherry Keathley Deputy
Sherry Keathley



Attorney for Plaintiff:
Kristina N. Kastl
N Central EXPY STE 1000
Dallas TX 75204
214-821-0230

OFFICER'S RETURN

Came to hand on the _____ day of _____, 20____, at _____, o'clock ____ m., and executed in _____ County, Texas by delivering to each of the within named defendants in person, a true copy of this Citation with the date of delivery endorsed thereon, together with the accompanying copy of the Citation at the following times and places, to-wit:

Name	Date/Time	Place, Course and Distance from Courthouse
_____	_____	_____

And not executed as to the defendant(s), _____

The diligence used in finding said defendant(s) being: _____
and the cause or failure to execute this process is: _____
and the information received as to the whereabouts of said defendant being _____

FEES:

Serving Petition and Copy \$ _____

Total \$ _____

_____, Officer
_____, County, Texas
By: _____, Deputy

Affiant _____



CT Corporation

**Service of Process
Transmittal**

12/09/2021

CT Log Number 540715264

TO: Kim Lundy- Email
Walmart Inc.
702 SW 8TH ST
BENTONVILLE, AR 72716-6209

RE: Process Served in Texas

FOR: Wal-Mart Real Estate Business Trust (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Re: MCCLUNG MICHAEL AND MINDY MCCLUNG // To: Wal-Mart Real Estate Business Trust

DOCUMENT(S) SERVED: Citation, Petition and Demand

COURT/AGENCY: Kaufman County Court At Law, TX
Case # 109720CC

NATURE OF ACTION: Personal Injury - Slip/Trip and Fall - 12/06/2019, Wal-Mart Supercenter #5191 located at 802 E. U.S. Highway 80, Forney, TX, 75126

ON WHOM PROCESS WAS SERVED: C T Corporation System, Dallas, TX

DATE AND HOUR OF SERVICE: By Process Server on 12/09/2021 at 03:22

JURISDICTION SERVED : Texas

APPEARANCE OR ANSWER DUE: By 10:00 a.m. of the Monday next following the expiration of 20 days after service (Document(s) may contain additional answer dates)

ATTORNEY(S) / SENDER(S): Kristina N. Kastl
Kastl Law, P.C.
4144 N Central Expy, Suite 1000
Dallas, TX 75204
214-821-0230

ACTION ITEMS: CT has retained the current log, Retain Date: 12/09/2021, Expected Purge Date: 12/14/2021

Image SOP

REGISTERED AGENT ADDRESS: C T Corporation System
1999 Bryan Street
Suite 900
Dallas, TX 75201
877-564-7529
MajorAccountTeam2@wolterskluwer.com

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PROCESS SERVER DELIVERY DETAILS

Date: Thu, Dec 9, 2021

Server Name: Troy Hernandez

Entity Served	WAL-MART REAL ESTATE BUSINESS TRUST
Case Number	109720CC
Jurisdiction	TX



PERSONAL CITATION
THE STATE OF TEXAS

CAUSE # 109720-CC

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TO: **WAL-MART REAL ESTATE BUSINESS TRUST**
c/o C T Corporation System
1999 Bryan Street Ste 900
Dallas TX 75201

Respondent Greetings:

YOU ARE HEREBY COMMANDED to appear before the Honorable County Court at Law, Kaufman County, Texas, by filing a written answer to the **PLAINTIFF'S ORIGINAL PETITION AND JURY DEMAND** of the Plaintiff at or before 10:00 o'clock a.m. of the Monday next after the expiration of 20 days from the date of service hereof, a copy of which accompanies the Citation in Cause Number **109720-CC**, styled **MICHAEL MCCLUNG, MINDY MCCLUNG Vs. WAL-MART STORES TEXAS, LLC D/B/A WAL-MART SUPERCENTER #5191, WAL-MART REAL ESTATE BUSINESS TRUST**, filed in said court on December 06, 2021. WITNESS, RHONDA HUGHEY, District Clerk of Kaufman County, Texas.

Issued and given under my hand and seal of said Court at Kaufman, Texas, on this the 7th day of December, 2021.

RHONDA HUGHEY
DISTRICT CLERK
100 W Mulberry St
Kaufman, TX 75142

By:  Deputy
Sherry Keathley

Attorney for Plaintiff:
Kristina N. Kastl
4144 N Central EXPY STE 1000
Dallas TX 75204
214-821-0230

OFFICER'S RETURN

Came to hand on the _____ day of _____, 20____, at _____, o'clock ____m., and executed in _____ County, Texas by delivering to each of the within named defendants in person, a true copy of this Citation with the date of delivery endorsed thereon, together with the accompanying copy of the Citation at the following times and places, to-wit:

Name	Date/Time	Place, Course and Distance from Courthouse
_____	_____	_____

And not executed as to the defendant(s), _____

The diligence used in finding said defendant(s) being: _____
and the cause or failure to execute this process is: _____
and the information received as to the whereabouts of said defendant being _____

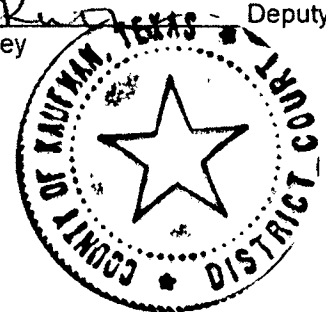
FEES:

Serving Petition and Copy \$ _____

Total \$ _____

_____, Officer
_____, County, Texas
By: _____, Deputy

Affiant



CAUSE NO. 109720-CC

MICHAEL McCLUNG	§	IN THE COUNTY COURT
AND MINDY McCLUNG	§	
	§	
VS.	§	
	§	AT LAW OF
WAL-MART STORES TEXAS, LLC	§	
D/B/A WAL-MART SUPERCENTER	§	
#5191, AND WAL-MART REAL	§	
ESTATE BUSINESS TRUST	§	KAUFMAN COUNTY, TEXAS

WALMART DEFENDANTS' ORIGINAL ANSWER**TO THE HONORABLE JUDGE OF SAID COURT:**

COME NOW, Wal-Mart Stores Texas, LLC d/b/a Wal-Mart Supercenter #5191 and Wal-Mart Real Estate Business Trust, Defendants in the above-entitled and numbered cause, and file this Original Answer to Plaintiffs' Original Petition, and would respectfully show the Court as follows:

I. GENERAL DENIAL

Defendants generally deny the allegations contained in Plaintiffs' Original Petition, demand strict proof thereof, and say this is a matter for jury decision.

II. RULE 193.7 NOTICE

Pursuant to TEXAS RULES OF CIVIL PROCEDURE 193.7, Defendants provide notice that they intend to use Plaintiffs' production of all documents, tangible things and discovery items produced in response to discovery in any pre-trial proceeding or at trial.

III. JURY DEMAND

Defendants further demand a trial by jury.

WHEREFORE, PREMISES CONSIDERED, Defendants pray that upon final hearing hereof, Plaintiffs take nothing by this suit, that Defendants recover their costs, and that Defendants have such other and further relief, both at law and in equity, to which they may be justly entitled.

Respectfully submitted,

COBB MARTINEZ WOODWARD PLLC

1700 Pacific Avenue, Suite 3100

Dallas, TX 75201

(214) 220-5210 (phone)

(214) 220-5299 (fax)

By: /s/ Stacy Hoffman Bruce

STACY HOFFMAN BRUCE

Texas Bar No. 24036793

sbruce@cobbmartinez.com

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I certify a true and correct copy of this document has been forwarded to counsel for Plaintiff either by e-service, telefax, electronic mail, and/or regular U.S. mail on this 3rd day of January, 2022:

Kristina N. Kastl
Samantha C. Johnson
Kastl Law, P.C.
4144 North Central Expressway, Suite 1000
Dallas, TX 75204
214.821.0230 / fax 214.821.0231
eservice@kastllaw.com
kkastl@kastllaw.com
sjohnson@kastllaw.com

/s/ Stacy Hoffman Bruce
STACY HOFFMAN BRUCE

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Sandi Mallon on behalf of Stacy Bruce
 Bar No. 24036793
 smallon@cobbmartinez.com
 Envelope ID: 60425550
 Status as of 1/3/2022 8:49 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Kristina NKastl		eservice@kastllaw.com	1/3/2022 8:43:32 AM	SENT
Stacy H.Bruce		sbruce@cobbmartinez.com	1/3/2022 8:43:32 AM	SENT
Sandi Mallon		smallon@cobbmartinez.com	1/3/2022 8:43:32 AM	SENT
Kristina Kastl	24025467	kkastl@kastllaw.com	1/3/2022 8:43:32 AM	SENT
Samantha Johnson	24126019	sjohnson@kastllaw.com	1/3/2022 8:43:32 AM	SENT